

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

MONDIS TECHNOLOGY LTD.,

Plaintiff,

v.

LG ELECTRONICS, INC. and  
LG ELECTRONICS U.S.A., INC.,

Defendants.

Civil Case No.: 2:14-cv-00702-JRG

JURY TRIAL DEMANDED

**JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Plaintiff Mondis Technology, LTD, (“Mondis”) and Defendant LG Electronics, U.S.A., Inc. (“LG U.S.A.”) jointly file this motion seeking permission to extend the deadline for LG U.S.A. to respond to the complaint.

Co-defendant LG Electronics, Inc. (“LG Korea”) is a foreign corporation having its principal place of business in Korea. LG Korea has agreed to waive service of the summons and therefore is entitled to a 90-day extension to answer per Fed.R.Civ.P. 4(d)(3). Based upon said waiver, a copy of which is attached as Exhibit A hereto, LG Korea’s answer date is expected to be set for January 21, 2015.

The answer date for LG U.S.A. is currently set for November 6, 2014. Mondis and LG U.S.A. respectfully request that the Court extend the answer date for LG U.S.A. to January 21, 2015, such that both LG entities will answer on the same date. Because the requested extension for LG U.S.A. exceeds 45-days, the parties bring this request as a joint motion. A proposed order is attached for the Court’s convenience.

DATED: October 29, 2014

Respectfully submitted,

By: /s/Allen F. Gardner

Allen F. Gardner  
State Bar No. 24043679  
allengardner@potterminton.com  
POTTER MINTON  
A Professional Corporation  
110 N. College, Suite 500  
Tyler, TX 75702  
Tel: 903.597.8311  
Fax: 903.593.0846

*Attorney for Defendants LG Electronics, Inc.  
and LG Electronics U.S.A., Inc.*

By: /s/Jeffrey B. Plies (w/permission by Allen  
F. Gardner)

Jeffrey B. Plies  
Texas Bar No. 24027621  
jeff.plies@dechert.com  
DECHERT LLP  
300 W. 6th Street, Suite 2010  
Austin, TX 78701  
Telephone: (512) 394-3000

Otis W. Carroll  
Texas Bar No. 03895700  
nancy@icklaw.com  
Patrick Kelley  
Texas Bar No. 11202500  
patkelley@icklaw.com  
IRELAND, CARROLL & KELLEY, P.C.  
6101 S. Broadway, Suite 500  
Tyler, Texas 75703  
Tel: (903) 561-1600  
Fax: (903) 581-1071

*Attorneys for Plaintiff Mondis Technology Ltd.*

### **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who have consented to electronic service, Local Rule CV-5(a)(3)(A), on this 29th day of October, 2014.

/s/Allen F. Gardner